

1 John A. Vogt (State Bar No. 198677)
2 javogt@jonesday.com
3 Edward S. Chang (State Bar No. 241682)
4 echang@jonesday.com
5 JONES DAY
6 3161 Michelson Drive, Suite 800
7 Irvine, California 92612
8 Telephone: (949) 851-3939
9 Facsimile: (949) 553-7539
10 Attorneys for Defendant
11 INTELIUS INC.

12
13 UNITED STATES DISTRICT COURT
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA
15 SOUTHERN DIVISION
16

17 LISA LIBERI, et al.,
18
19 Plaintiff,
20
21 v.
22
23 ORLY TAITZ, et al.,
24
25 Defendants.
26
27
28

Case No. 8:11-CV-00485-AG
(AJWx)

Assigned for all purposes to
Hon. Andrew J. Guilford

**DECLARATION OF EDWARD S.
CHANG IN SUPPORT OF
APPLICATION TO THE CLERK
TO TAX COSTS**

[LOCAL RULE 54-3]

DECLARATION OF EDWARD S. CHANG

I, Edward S. Chang, hereby declare:

1. I am an attorney admitted to practice in this State and before this Court. I am associated with the firm of Jones Day, counsel for defendants Intelius Inc. (“Intelius” or “Defendant”). I make this Declaration in support of Intelius’ Application to Tax Costs. Except as otherwise stated, I make this Declaration on personal knowledge and, if called as a witness, could and would competently testify to the facts stated herein.

2. Attached as Exhibit 1 to the Bill of Costs is a detailed itemization of the costs incurred and paid by Intelius for which Intelius is entitled to recover from Plaintiffs. The total costs incurred by Intelius was \$580.78. As explained below, all of the services for these costs were actually and necessarily incurred and paid for by Defendant Intelius.

3. Attached as Exhibits 2-3 are true and correct copies of supporting documentation for \$258.35 for the costs of Reporter Transcripts for relevant hearings. These costs were actually and necessarily incurred and paid for by Intelius.

4. During the course of litigating this matter, Intelius incurred duplicating and reproduction costs of at least \$82.80 for exhibits attached to motions and other papers necessarily filed with the Court. A detailed itemization of the costs for exemplification and reproduction are set forth in Exhibit 1, Section B, pg. 1. The costs for duplication are calculated based on the number of pages of copies made and multiplied by the amount charged to Intelius per copy at the rate of \$0.20 per page. All of these costs were actually and necessarily incurred and paid by Intelius.

5. Attached as Exhibits 4-12 are true and correct copies of supporting documentation for \$239.63 in costs incurred for serving copies of all filings and pleadings and related exhibits on the Court’s chambers; such costs are deemed recoverable under Rule 54(d): “[u]nless a federal statute, these rules, or a court

1 order provides otherwise, costs—other than attorneys’ fees—should be allowed to
2 the prevailing party.” Furthermore, serving of such courtesy copies is required
3 under the local rules.

4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct.

6 Executed this 1st day of November, 2012, at Irvine, California.

7
8 /s/ Edward S. Chang

9 Edward S. Chang
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28